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December 3, 2024

VIA EMAIL ONLY

The Honorable John Milton Younge
United States District Court
for the Eastern District of Pennsylvania
601 Market Street, Courtroom 15-B
Philadelphia, PA 19106

Re: *Bennett v. Schnader Harrison Segal & Lewis LLP et al*
No. 2:24-cv-00592-JMY

Dear Judge Younge:

I represent Plaintiff Jo Bennett in the above-referenced civil action. I write on behalf of all counsel to provide a joint report to the Court about the status of settlement discussions. We are pleased to report that the parties have reached a settlement on behalf of a class, the material terms of which are reflected in a signed term sheet. The parties will now proceed with preparing a formal settlement agreement that will be subject to court approval pursuant to Federal Rule of Civil Procedure 23(e). As such, this matter should not be dismissed pursuant to Local Rule 41.1.

Given the complexity of the parties' settlement, which needs to be memorialized in a settlement agreement, as well as the upcoming holidays, and the need to prepare a motion for preliminary approval of the settlement, the parties anticipate filing a motion for preliminary approval of the settlement within approximately 75 days from today's date. Accordingly, the parties respectfully request that all remaining deadlines in the Scheduling Order be vacated and that the Court enter a revised Scheduling Order with a February 18, 2024 deadline for seeking class certification and preliminary approval of the parties' settlement.

Counsel are available to discuss the foregoing further at the Court's direction. Thank you for your consideration of this request.

Respectfully submitted,

Adam H. Garner

cc: All counsel of record (via email)